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Attorneys for Defendant
Spirit Airlines, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

TIMOTHY MEACHAM,
v.
Plaintiff,
SPIRIT AIRLINES INC. and; KERRIE
CONRAD,
Defendants.

Case No. 3:15-cv-00338-SI

**DEFENDANT SPIRIT AIRLINES
INC.'S UNOPPOSED MOTION
FOR EXTENSION OF DEADLINE**

CERTIFICATE OF COMPLIANCE WITH LR 7-1(a)

I hereby certify that defense counsel for Spirit Airlines, Inc. has conferred with counsel for the plaintiff in a good faith effort to resolve this matter. The parties agreed to the following request, and this motion is unopposed.

MOTION

Pursuant to LR 16-3, defendant Spirit Airlines, Inc. moves the Court for an extension of time to Monday, March 23, 2015 to file its Answer or otherwise respond to the plaintiff's Complaint.

MEMORANDUM IN SUPPORT OF MOTION

Defendant Spirit Airlines, Inc. was served with the Summons and Complaint on January 30, 2015. On February 25, 2015 Spirit Airlines, Inc. removed this action from Oregon state court to the U.S. District Court for the District of Oregon. Rule 81(c)(2)(C) of the Federal Rules of Civil Procedure would require Spirit Airlines to file its Answer within 7 days of removal. However, Spirit Airlines requests additional time to investigate the claims and to draft its Answer.

Defense counsel for Spirit Airlines spoke with Mr. Ball, counsel for the plaintiff, on February 25, 2015 and requested additional time to prepare and file an Answer. Mr. Ball agreed with that request and defendant Spirit Airlines seeks court approval of the extension of time in accordance with LR 16-3 and 29-1.

It is the understanding of Spirit Airlines that its co-defendant, Kerrie Conrad, has not yet been served. It is not expected that this requested extension of time will cause any significant delay in the progression of the action, especially given the fact that one of the parties has not been served.

This motion is made in good faith and not for purposes of delay. Spirit Airlines respectfully requests that the Court grant its request for an extension of time.

DATED this 25th of February, 2015.

s/ Steven O. Rosen
Steven O. Rosen, OSB # 785009
Rosen@RosenLawFirm.com
Of Attorneys for Defendant Spirit Airlines, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **DEFENDANT SPIRIT AIRLINES INC.'S UNOPPOSED MOTION FOR EXTENSION OF DEADLINE** by the following indicated method or methods:

- by **mailing** full, true, and correct copies thereof in sealed, first-class postage-prepaid envelopes, addressed to the attorney(s) as shown below, the last-known address(es) of the attorney(s) and deposited with the United States Postal Service at Portland, Oregon on the date set forth below.
- by causing full, true, and correct copies thereof to be **hand-delivered** via messenger to the attorney(s) at the last-known address(es) listed below on the date set forth below.
- Notice of this filing will be sent by e-mail to plaintiff's counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

Mr. William Ball
Attorney William Ball, LLC
420 SW Washington, Suite 400
Portland, OR 97204

Attorney for plaintiff Timothy Meacham

DATED this 25th day of February, 2015.

s/ Steven O. Rosen
Steven O. Rosen, OSB #785009